

<p align="center">U.S. DEPARTMENT OF ENERGY (DOE) NATIONAL TRANSPORTATION PROGRAM, ALBUQUERQUE (NTP-A) Standard Operating Procedure</p>			
<p>Title: NTP-A/PO Requirements for Planning, Conducting, Documenting, Reporting, and Tracking Compliance Evaluation Activities of DOE Field Office Reviews</p>			
<p>Procedure No: NTP-A-FOTEP.002</p>	<p>Revision No: 0</p>	<p>Date: November 2000</p>	<p>Page: 1 of 14</p>

1.0 PURPOSE

To specify a consistent approach to planning, conducting, documenting, reporting and tracking compliance evaluation activities related to transportation, traffic, packaging, and logistics operations by National Transportation Program, Albuquerque (NTP-A) and other Program Offices of the responsible DOE/NNSA Field Office.

2.0 SCOPE

Provide requirements and approach for NTP-A/PO evaluation of DOE/NNSA Field Office transportation and/or packaging organization affecting transportation management activities to ensure implementation of applicable requirements and specifications.

This procedure applies to DOE Headquarters (e.g. NTP-A and Program Offices) and DOE/NNSA Field Office personnel performing transportation-related tasks and activities.

3.0 REQUIREMENTS, REFERENCES AND DEFINITIONS

3.1 Requirements

- a. DOE Order 460.1A, "Packaging and Transportation Safety," October 2, 1996.
- b. DOE Order 460.2, Change 1, Version 1, "Departmental Materials Transportation and Packaging Management," September 27, 1995.
- c. DOE Order 200.1, "Information Management Program," September 30, 1996

3.2 References

- a. DOE Manual 411.1-1A, "Safety Management Functions, Responsibilities, and Authorities Manual," October 18, 1999.
- b. DOE Order 414.1A, "Quality Assurance," September 29, 1999.
- c. DOE G 414.1A, "Quality Assurance Management Systems Guide for Use with 10 CFR 830.120 and DOE O 414.1," June 17, 1999.
- d. EM-1 Memorandum, "Request for Field Managers Certification of Low-Level Waste Packaging and Transportation Practices," February 6, 1998.

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3.3 Definitions

- a. Corrective Actions Plan - A memorandum, letter, or action plan written by the evaluated organization in response to the final Field Office Transportation Evaluation Program (FOTEP) Report. This response should contain a description of the corrective action to be taken for evaluation findings; a schedule for implementation of corrective action; and a detailed explanation regarding any disputed findings.
- b. Deficiency - A condition of an activity, attribute, documentation, or procedure that renders it unacceptable, indeterminate, or noncompliant.
- c. Evaluation - The act of reviewing, inspecting, testing, checking, surveilling, auditing, or otherwise determining and documenting whether items, processes, or services meet specified requirements. For the purpose of this document, the terms “audit,” “verification,” and “evaluation” are considered to be synonymous.
- d. Evaluation Program Coordinator - A DOE/NNSA employee or designated contractor who will coordinate, implement, and administer FOTEP activities. The EPC may assist NTP-A/PO, if requested, in the selection of members for the evaluation team and/or in organizing and directing the evaluation process. If the EPC is a DOE/NNSA employee they may or may not be an evaluator. If he/she is to perform that function, then they must meet the requirements listed in Section 8.0.
- e. Evaluation Team - Individual(s) tasked to conduct a specific evaluation as the same time as an evaluator(s) or technical specialist.
- f. Evaluation Team Leader – Assumes a leadership role during pre-evaluation, evaluation, and post-evaluation activities. Evaluation Team Leader also provides Field Office management interface. Evaluation Team Leader must be NTP-A/PO and/or a designated DOE/NNSA employee.
- g. Evaluator - A DOE/NNSA federal employee who by qualification of experience, training, and/or education participates on the evaluation team and can demonstrate fulfillment of specific requirements as they relate to the FOTEP process.
- h. Nonconformance - The nonfulfillment of a specific requirement. For the purpose of this document, nonconformance and noncompliance are considered to be synonymous.

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- i. Objective Evidence - Information that can be proved true based on facts obtained through observations, measurement, test or other means.
- j. Observation - A statement of fact made during an evaluation and substantiated by objective evidence.
- k. Self-Assessment - An assessment of work by the performer according to specified rules.

4.0 GENERAL

- 4.1** Evaluation activities are performed, as specified in DOE Order 460.2, to verify that all applicable requirements are being met. Evaluation activities are conducted to:
 - a. Determine the existence of a documented management system for the performance of activities and work
 - b. Evaluate the adequacy of management systems to meet applicable requirements
 - c. Determine whether management and work activities are being implemented in accordance with established systems, procedures, regulations and policies
 - d. Determine the effective ability of the system to produce the desired result of the appropriate quality
 - e. Monitor work in progress
 - f. Document compliance or noncompliance with requirements, policies, and procedures
 - g. Identify actual and potential deficiencies and nonconformances promptly
 - h. Promote prompt corrective action by the management personnel who are responsible for performing work
 - i. Provide management information on compliance and quality-affecting activities
 - j. Track and verify timely implementation of corrective actions
 - k. Promote continuous improvement in work activities.
- 4.2** An evaluation team may consist of one or more persons. Where only one person performs the evaluation activity, that individual will assume responsibilities of evaluation team leader.
- 4.3** Evaluation activities will be performed by personnel who meet requirements of the FOTEP Management Plan and are knowledgeable in the activities being evaluated.
- 4.4** Assigned evaluation personnel are responsible for completing the specific checklist, reporting results and/or deficiencies and preparing the FOTEP Evaluation Form.

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4.5 The final FOTEP report format will consist of the following sections:

- a. Table of Contents
- b. Introduction
- c. Scope
- d. Summary of evaluation activities
- e. Assistance Activity
- f. Conclusion
- g. Recommendations
- h. Completed FOTEP Evaluation Form(s)

4.6 Follow-up and close-out of corrective action items (nonconformances) are the responsibility of the evaluation team leader. If NTP-A/PO is not the team leader, a copy of the final close-out letter will be submitted to NTP-A for tracking purposes.

5.0 PROCEDURE

Attachment A contains a flow chart depicting the overall work process associated with this procedure.

6.0 RECORDS

Documents generated as a result of this procedure will be identified, classified, and prepared in accordance with DOE Order 200.1, and will be managed with respect to requirements specified in DOE G 200.1. At a minimum, the following are to be considered Quality Assurance (QA) records:

- 6.1 Evaluation Notification Memorandum or Letter
- 6.2 Attendance Record Form(s)
- 6.3 Evaluation Report
- 6.4 Evaluation Response(s)
- 6.5 Response Letter(s)

7.0 ATTACHMENTS

- 7.1 Attachment A: Compliance Evaluation - Process Flow Diagram
- 7.2 Attachment B: Attendance Record Form (Example)
- 7.3 Attachment C: FOTEP Evaluation Form
- 7.4 Attachment D: Observation Performance Levels

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8.0 REVISION LISTING

<u>Revision Number</u>	<u>Description</u>	<u>Revision Date</u>
0	NTP-A-FOTEP.002	November 2000

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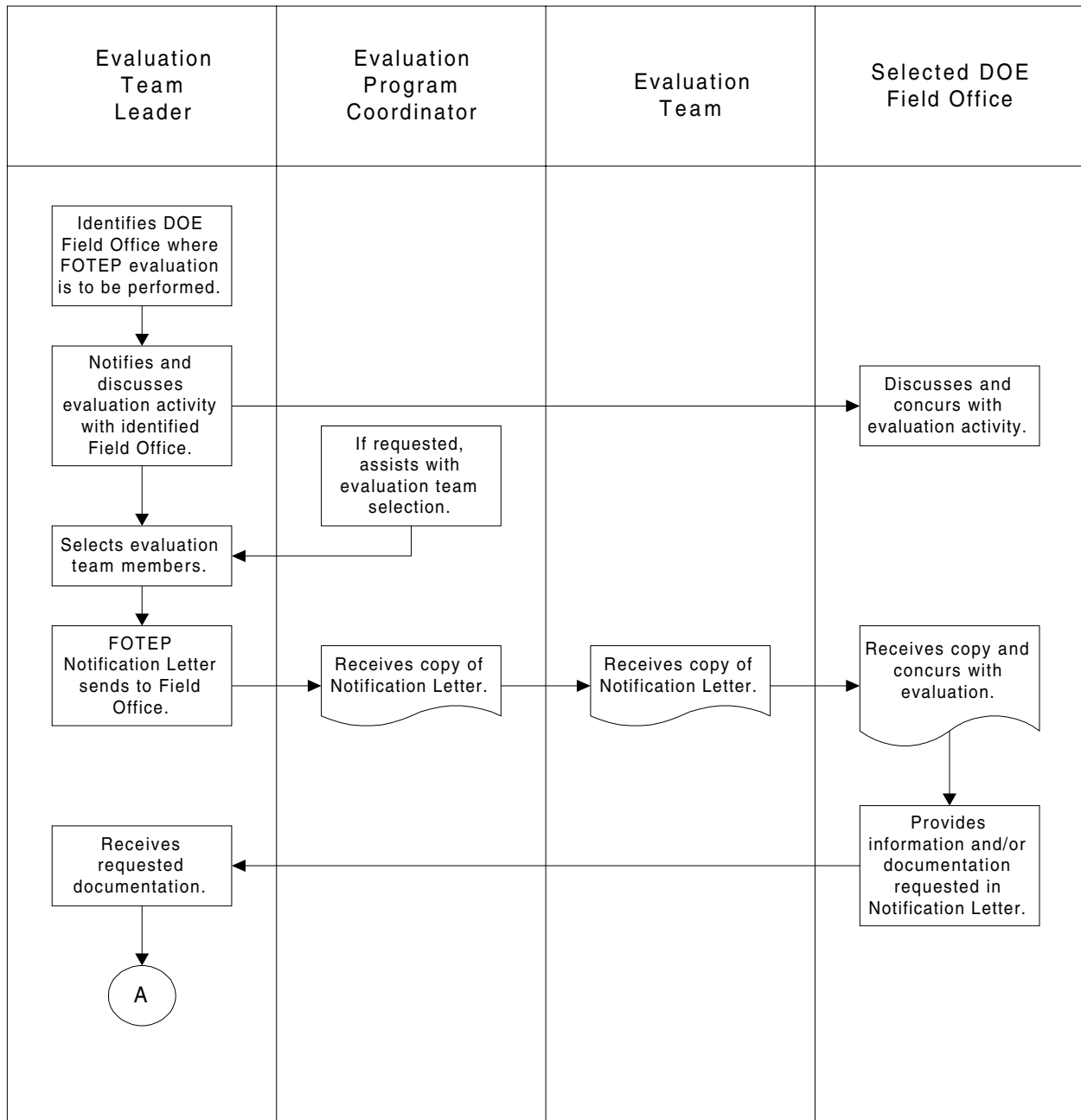
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Attachment A
Field Office Compliance Evaluation
Process Flow Diagram



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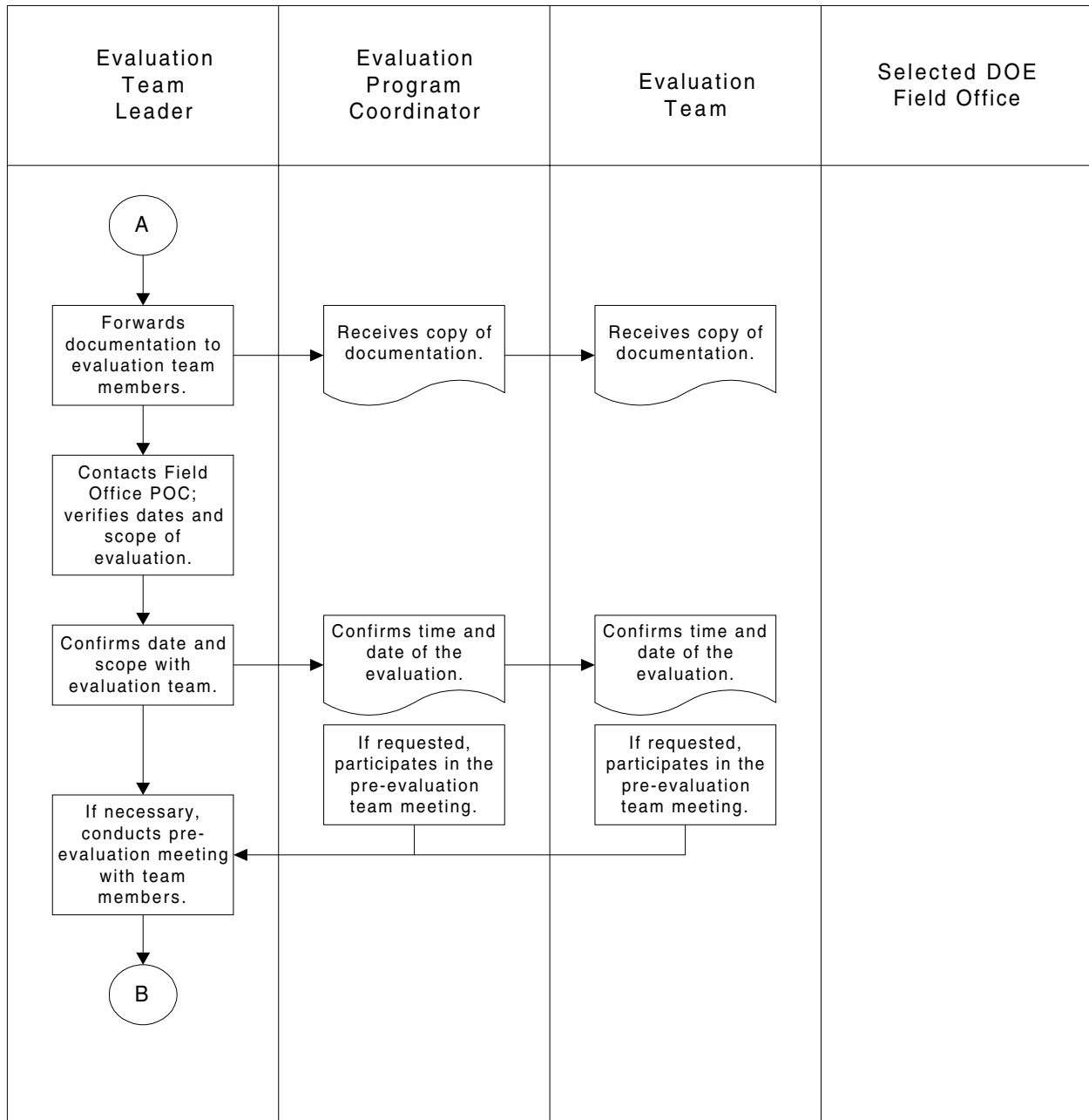
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Attachment A Continued
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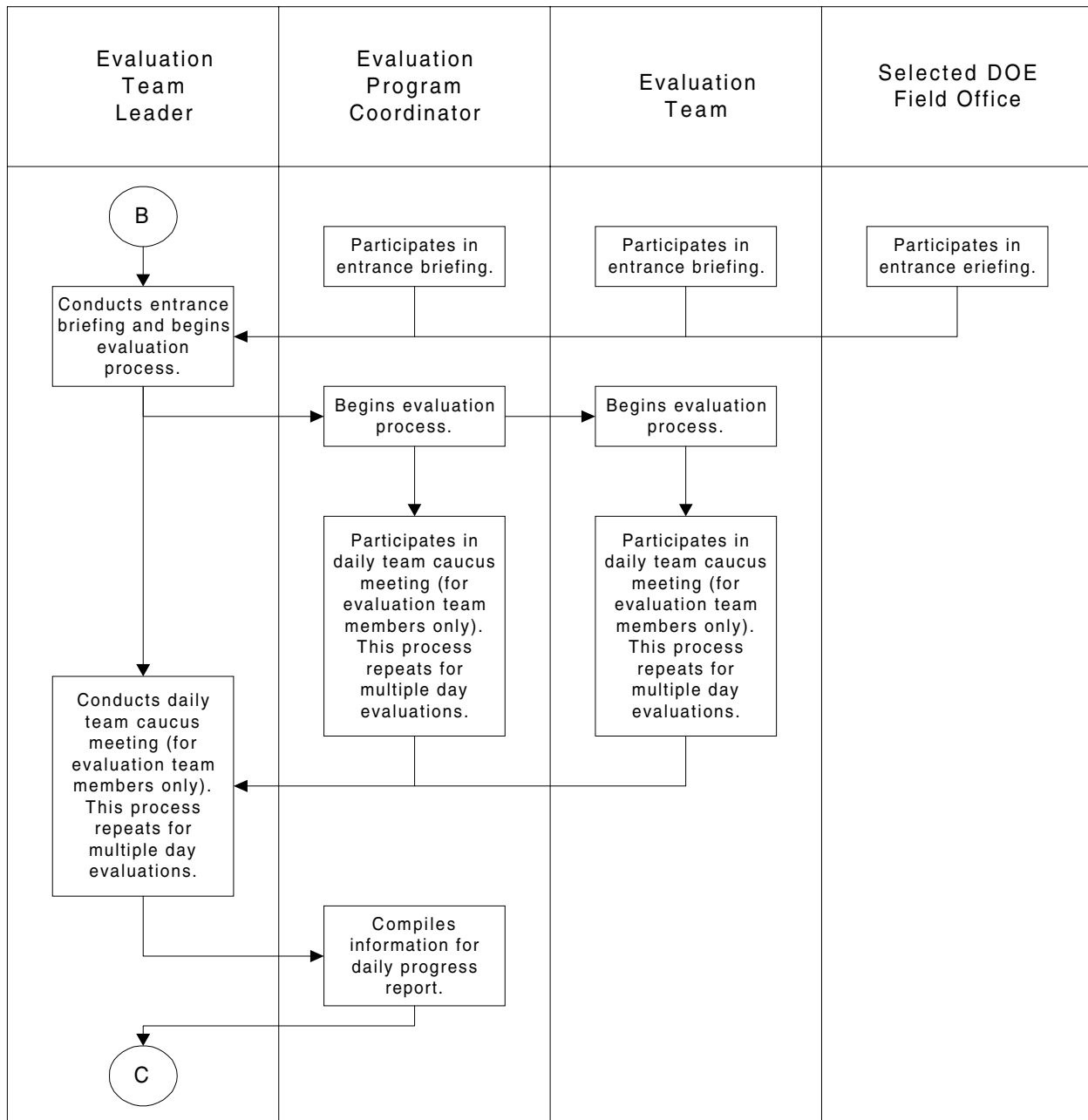
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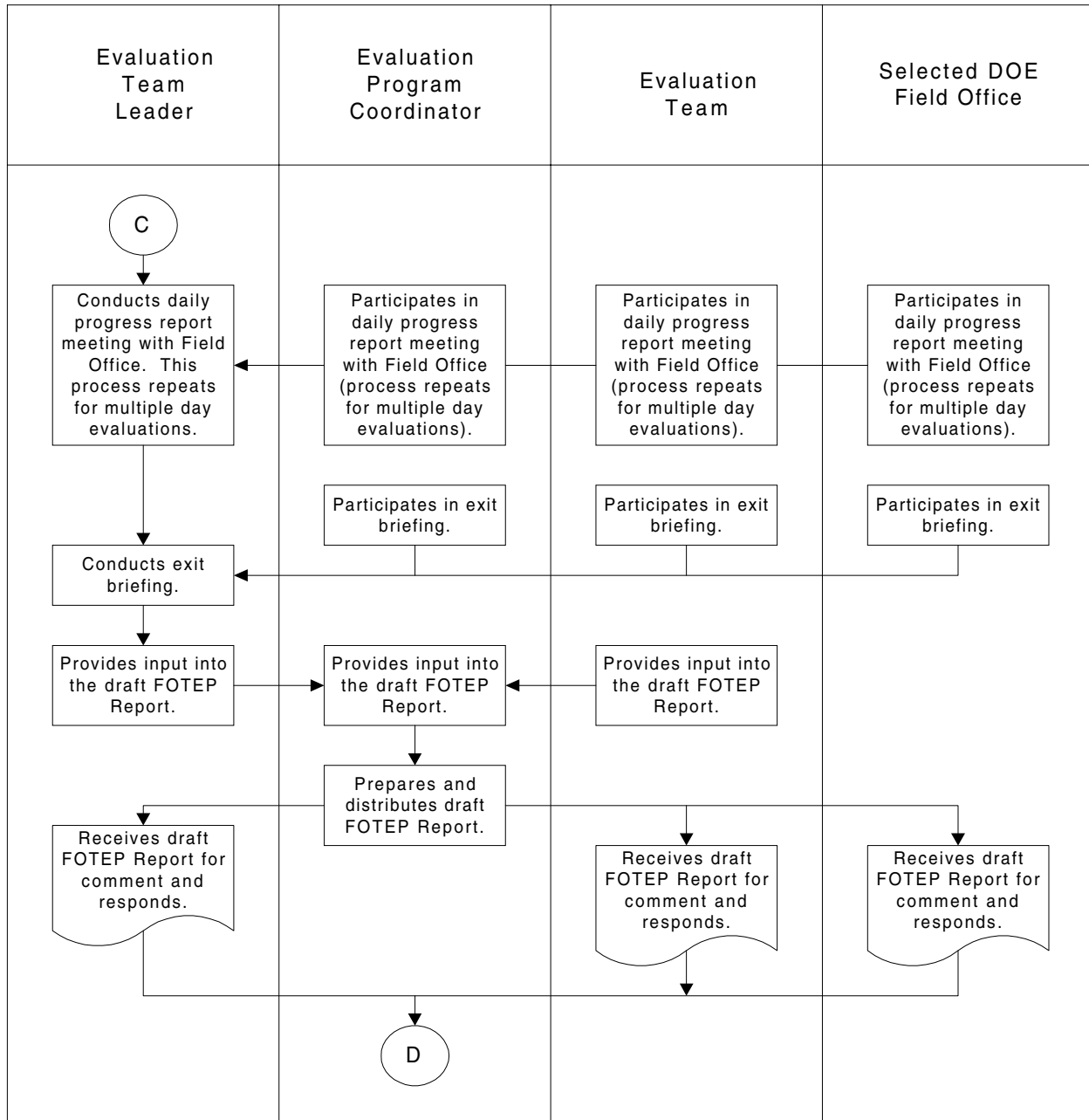
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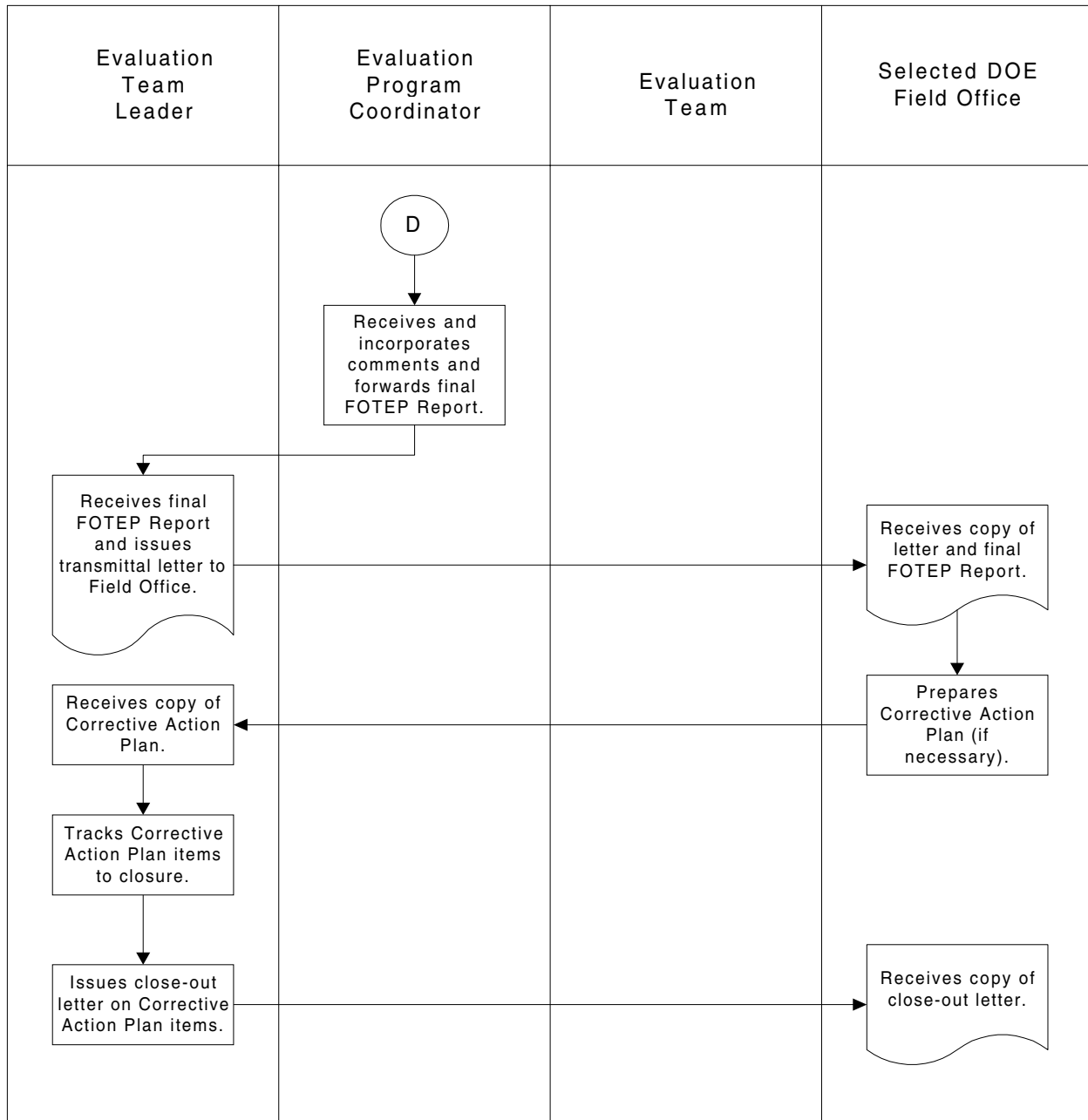
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Attachment B
Attendance Record Form (example)

FOTEP ATTENDANCE RECORD FORM

Sheet of

Date:

☐ EVALUATION ☐ PRE-EVALUATION MEETING ☐ DAILY PROGRESS REPORT
☐ ASSISTANCE ☐ ENTRANCE BRIEFING ☐ EXIT BRIEFING
☐ OTHER: ☐ TEAM CAUCUS MEETING

EVALUATION TEAM LEADER

Signature

Date

BRIEF SUMMARY OF MATERIAL COVERED:

NAME OF ATTENDEE

COMPANY

PHONE NUMBER

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Attachment C
FOTEP Evaluation Form Instructions

EXAMPLE FOTEP EVALUATION FORM

FUNCTIONAL AREA: EVALUATOR:	FIELD OFFICE: TEAM LEADER:	CRITERIA MET:	
		YES __	NO __

OBJECTIVE:

The objective as described in the FOTEP Management Plan for the area to be evaluated is listed here.

CRITERIA:

The criteria to be checked and/or evaluated are listed here. A separate checklist has been developed for evaluation purposes.

APPROACH:

Record Review: Describes the records review process or the records to be reviewed.

Interviews: Describes the interview process and how interviews should be performed.

Performance Observation: Describes the observation process to be performed.

The first three sections (objective, criteria and approach) are already filled out for the evaluator.

LIST RECORDS REVIEWED:

The evaluator lists here all of the documents that were reviewed by name, title, number, etc.

LIST INTERVIEWS CONDUCTED:

All interviews conducted by the evaluator are listed by title only. Names of specific individuals are not used.

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LIST PERFORMANCE OBSERVATIONS MADE:

Performance observations witnessed by the evaluator (e.g. shipment preparation, etc.) during the evaluation process are listed here.

DISCUSSION OF RESULTS:

In this narrative section of the evaluation form, the evaluator describes what took place during the evaluation process. All comments that pertain to the document review, interviews, and performance observations will be demonstrated in narrative form.

CONCLUSION:

The individual evaluator provides the summary conclusion of the evaluation here.

OBSERVATION(S):

Observation 01. List each observation made (include level identification) here.

Reference/Requirement:

List all references here to identify the actual requirement identified in the observation statement above.

Recommendation:

Provide a recommendation to bring the particular observation into compliance with the requirement listed above.

Observation steps are repeated as many times as necessary. If no observations are noted then “none” should be is the response in the Observation section.

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Attachment D Observation Performance Levels

The Regulatory Compliance section describes transportation- and packaging-related observations that are considered to be unsafe or out of regulatory compliance. Observations are ranked by the entire evaluation team with consideration given to impacts on transportation and packaging operations in the areas of safety, regulatory compliance, and best management practice. These concerns are ranked and discussed in the following order:

Level 1: Transportation- and packaging-related observations that are; or are perceived to be; an imminent danger or significant safety hazard to workers, the public, or the environment. The lead DOE representative has the authority to recommend or issue a “stopwork” order for activities identified as Level 1 action items.

Level 2: Observations that are developed from an evaluation of transportation- and packaging-related activities and indicate the management system is not in control. These observations represent the overall evaluation of the operation, activity, organization or site regulatory and policy compliance status.

Level 3: Individual transportation- and packaging-related activities that are; or are perceived to be; in violation of federal regulations, DOE Orders, or other applicable regulatory and policy requirements, but can be used to demonstrate that management systems are in control.

The Best Management Practice component addresses concerns that, if improved, would result in safer, more efficient transportation operations and activities. This component also addresses implementation of transportation- and packaging-related standards, costs, mission impacts, and potential external reactions. These concerns are ranked and discussed in the following order:

Level 4: Observations that represent the evaluation team's overall evaluation of the operation, activity, organization, or site status in terms of best management practice implementation.

Level 5: Individual transportation- and packaging-related observations that deviate significantly from transportation or packaging industry standards and may impact cost and/or mission if left uncorrected.

Level 6: Recommendations that are made to enhance a process or procedure, but do not indicate a violation of regulation, policy or procedure has taken place.

Noteworthy practices in transportation and packaging activities discovered during a review or evaluation process will be highlighted in a lessons learned section of the NTP-A web site on a quarterly basis once the program has been implemented.